

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FELIX ESPOSITO AND
ACCESS WITH SUCCESS, INC.,
Plaintiffs

v.

BEST WESTERN INTERNATIONAL,
INC.; 29 HANCOCK STREET
LLC; and ADAMS INN
FACILITIES, INC.,
Defendants

CIVIL ACTION NO. 05-10349-
WGY

DEFENDANTS' ASSENTED-TO MOTION TO EXTEND TIME
FOR FILING RESPONSIVE PLEADING

The defendants Best Western International, Inc.; 29 Hancock Street LLC; and Adams Inn Facilities, Inc., move that the time within which they shall file a responsive pleading be extended to and including May 31, 2005, that being 63 days after the responsive pleading of the defendant Best Western International, Inc., would ordinarily be due, it having been served on March 9, 2005. The other two defendants have not been served, but will waive service. Plaintiffs assent to this motion.

This additional time will be used for the following purposes:

- To permit the plaintiffs and 29 Hancock Street LLC and Adams Inn Facilities, Inc. to arrange a walk-through of the premises in question, and prepare their reports on compliance with the Americans with Disabilities Act. The plaintiffs and 29 Hancock Street LLC and Adams Inn Facilities, Inc. intend to discuss settlement prospects, based upon those reports.
- To arrange a potential joint defense and to allow 29 Hancock Street LLC and Adams Inn Facilities, Inc. to determine whether they have insurance coverage of plaintiffs' claims.

Finally, 29 Hancock LLC and Adams Inn Facilities, Inc. agree not to file dispositive motions during the extension period.

WHEREFORE, for the good cause shown, the parties request an extension until May 31, 2005 to file a response to the Complaint in this matter.

BEST WESTERN INTERNATIONAL, INC.

By their attorneys,

s/Leonard H. Freiman
Leonard H. Freiman, BBO #560233
Joseph C. Lyons, BBO #644954
Goulston & Storrs, P.C.
400 Atlantic Avenue
Boston, MA 02110
(617) 482-1776

29 HANCOCK STREET LLC
ADAMS INN FACILITIES, INC.

By their attorneys,

s/Michael R. Coppock
Michael R. Coppock, BBO #098840
Rubin and Rudman LLP
50 Rowes Wharf
Boston, MA 02110
(617) 330-7000

ASSENTED TO:

s/Nicholas S. Guerrera
Nicholas S. Guerrera, BBO #551475
Shaheen, Guerrera & O'Leary, LLC
Counsel for the Plaintiffs
Jefferson Office Park
820A Turnpike Street
North Andover, MA 01845
(978) 689-0800